

**UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF COLUMBIA**

UNITED STATES OF AMERICA	:	Criminal No.
	:	
v.	:	VIOLATIONS:
	:	
MICHAEL A. BROWN,	:	18 U.S.C. § 201(b)(2)(A)
	:	(Bribery of a Public Official)
Defendant.	:	
	:	FORFEITURE:
	:	
	:	18 U.S.C. § 981(a)(1)(C), 28 U.S.C.
	:	§ 2461(c), 21 U.S.C. § 853(p)

INFORMATION

The United States Attorney charges:

COUNT ONE
(Bribery)

Beginning on or about July 11, 2012, through on or about March 14, 2013, in a continuing course of conduct, in the District of Columbia and elsewhere, the defendant, MICHAEL A. BROWN, being a public official until on or about January 2, 2013, to wit, an elected at-large member of the Council of the District of Columbia, directly and indirectly, corruptly demanded, sought, received, accepted, and agreed to receive and accept things of value personally, to wit, fifty-five thousand dollars (\$55,000.00) in cash from representatives of Company M, whom unbeknownst to defendant BROWN were undercover employees of the Federal Bureau of Investigation, in return for being influenced in the performance of an official act, to wit, offering to provide and providing official assistance to Company M to obtain

approval as a Certified Business Enterprise from the District of Columbia's Department of Small and Local Business Development and contracting opportunities in the District of Columbia.

(Bribery of a Public Official, in Violation of Title 18, United States Code, Section 201(b)(2)(A))

FORFEITURE ALLEGATION

1. Upon conviction of the offense alleged in Count One, the defendant shall forfeit to the United States any property, real or personal, which constitutes or is derived from proceeds traceable to this offense, pursuant to 18 U.S.C. § 981(a)(1)(C) and 28 U.S.C. § 2461(c). The United States will seek a forfeiture money judgment against the defendant in the amount of \$35,000.

2. If any of the property described above as being subject to forfeiture, as a result of any act or omission of the defendant:

- a. cannot be located upon the exercise of due diligence;
- b. has been transferred or sold to, or deposited with, a third party;
- c. has been placed beyond the jurisdiction of the Court;
- d. has been substantially diminished in value; or
- e. has been commingled with other property that cannot be divided without difficulty;

the defendant shall forfeit to the United States any other property of the defendant, up to the value of the property described above, pursuant to 21 U.S.C. § 853(p).

(Criminal Forfeiture, pursuant to Title 18, United States Code, Section 981(a)(1)(C), Title 28, United States Code, Section 2461(c), and Title 21, United States Code, Section 853(p))

RONALD C. MACHEN JR.
United States Attorney
In and For the District of Columbia

By:



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